

REMARKS

Claims 1-18 are pending in the application. By this amendment, claims 1, 10, and 18 are amended. Support for the claim amendments can be found at least at page 4, lines 30-25 of the present application. No new matter is introduced. Reconsideration and issuance of a Notice of Allowance are respectfully requested.

35 U.S.C. § 112 Rejections

On page 2 the Office Action rejects claim 18 under 35 U.S.C. § 112. This rejection is respectfully traversed. Applicant respectfully submits that the limitation “computer readable medium” is recited at least in original claim 18 of the originally filed application. Further, the limitation “computer readable medium” is inherently included in the specification because one skilled in the art will appreciate that software cannot exist in vacuum and must exist on a computer readable medium.

35 U.S.C. § 102 Rejections

On page 2 the Office Action rejects claims 1-18 under 35 U.S.C. § 102(b) as over United States Patent Application Publication 20020038340 to Whipple et al. (hereinafter Whipple). The Office Action equates the “request” of Whipple with the “device-agnostic policy implementation” as recited in the claims of the present application; equates the “clients, server, and request broker” of Whipple with the “network devices” as recited in the claims of the present application. This rejection is respectfully traversed.

Whipple is directed to a network application program interface that facilitates communication in a distributed network environment. Specifically, each of Whipple’s translators is associated with a different *native format*. See Abstract, paragraphs [0005] and [0016]. A different *native format* is *not* a different *request* (equated as the “device-agnostic policy implementation” by the Office Action) and is *not* a different *client, server, or request broker* (equated as the “network devices” by the Office Action). Accordingly, Whipple does not disclose or suggest that *each translator* corresponds to a different *network device* and a different *device-agnostic policy implementation*. Further, because Whipple does not provide a translator for each network device and each device-agnostic policy implementation, Whipple does not disclose or suggest that *subsequent additions or maintenance* of any of the network devices and any of the device-agnostic policy implementations are provided *using device-agnostic files*.

To the contrary, claim 1 has been amended to more precisely recite the novel features of the present application and recites: “plurality of device translators, each device translator corresponding to a respective one of said plurality of network devices and one of said

plurality of device-agnostic policy implementations ... wherein subsequent additions or maintenance of any of said plurality of network devices and any of said plurality of device-agnostic policy implementations are provided using device-agnostic files." As noted above, Whipple does not disclose or suggest these features. Therefore, amended claim 1 is patentable.

Claims 10 and 18 recite features similar to those of claim 1, and for this reason, claims 10 and 18 also are patentable.

Claims 2-9 depend from patentable claim 1; and claims 11-17 depend from patentable claim 10. For these reasons and the additional features they recite, claims 2-9 and 11-17 also are patentable.

Withdrawal of the rejection of claims 1-23 under 35 U.S.C. §102(b) is respectfully requested.

Conclusion

In view of the above remarks, Applicant respectfully submits that the application is in condition for allowance. Prompt examination and allowance are respectfully requested.

Should the Examiner believe that anything further is desired in order to place the application in even better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the telephone number listed below.

Respectfully submitted,

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